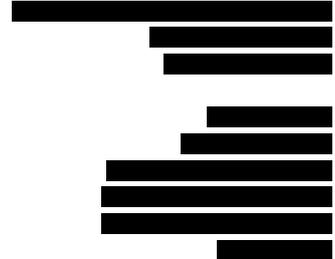


20 August 2025



Planning Policy Team
South Kesteven District Council
Council Offices
The Picture House
St Catherine's Road
Grantham,
NG31 6TT

Lynette Swinburne BSc (Hons) DipTP MRTPI



By email only

Dear Sir or Madam,

South Kesteven District Council (SKDC), Regulation 18 Proposed Housing and Mixed-Use Site Allocations (July-August 2025)

- **SKPR-144 Land to the West of Millfield Road, Market Deeping**

Savills (UK) Ltd represents Lincolnshire County Council Corporate Property who is the owner of the above site, which was submitted for consideration through the SKDC Call for Sites exercise in November 2020.

Site SKPR-144 Land to the West of Millfield Road, Market Deeping was proposed as an allocation for 200 dwellings in the Regulation 18 Draft Local Plan (February 2024).

It is understood that SKDC are undertaking a targeted Regulation 18 consultation in relation to 'Proposed Housing and Mixed-Use Sites' as a result of an increase in the housing targets for the District arising from the updated NPPF (published in December 2024).

Paragraph 1.2 of the consultation document confirms:

"The changes made by national government has substantially increased South Kesteven District's annual housing need from 701 (as published through 2024 Draft Local Plan) to 886 dwellings per year, an uplift of 185 dwellings per year. This means that the Local Plan's minimum housing need is 17,720 dwellings across the plan period (2023-2043)."

SKDC therefore require more sites to deliver this growth across the District.

Savills UK Ltd have reviewed the Regulation 18 Proposed Housing and Mixed-Use Site Allocations consultation document and a response on behalf LCC Corporate Property is set out below.

Removal of proposed allocations

Table 3 in section 3.1 sets out those sites proposed as draft allocations which will not be taken forward into the future stages of the Local Plan.

The previous Regulation 18 Draft Local Plan consultation 2024 included SKPR-144 Land to the West of Millfield Road, Market Deeping as an allocation for 200 dwellings. Lincolnshire County Council Corporate Property wrote in April 2024 to confirm their support this allocation. The site was considered as a potential allocation through the preparation of the now adopted South Kesteven Local Plan. It was excluded from that Plan on the

basis only of its availability, which was affected by an undetermined Village Green Application (VGA). The VGA was unsuccessful but the decision was only issued after the Local Plan Examination had concluded. However, the Inspector did recognise the site's potential as an allocation, recommending the inclusion of paragraph 3.48 in the adopted Local Plan which states (emphasis added):

“A provisional site allocation at Millfield Road was put forward for public consultation in summer 2017 as part of the Consultative Draft Local Plan, under Regulation 18 of the Local Plan regulations. After the start of the consultation, an application was submitted to the County Council to designate this site as a Village Green. The outcome of this application is yet to be determined and so this site has not been considered as available for development in this Local Plan. If the application is not successful then the status of the site could be reviewed through the preparation of the Deepings Neighbourhood Plan or by the first review of this Local Plan, subject to its availability and suitability as well as consideration of any additional housing requirements.”

As the previous submissions in relation to the site confirm, a planning application was refused by SKDC's planning committee in October 2020. The reasons for refusal related primarily to the concerns of residents living very close to the site.

Full details of the site's history is provided in Appendix 1. It is important to note that the committee report accompanying the application confirmed that there were no technical reasons which would prevent the site from being developed.

Table 5, paragraph 3.1 includes a number of '**Additional proposed allocations**' to meet the district's increased housing need. This includes two further sites in The Deepings:

- SKPR - 330 'Land east of Linchfield Road' for 840 dwellings; and
- SKPR - 55 'Towngate East' for 104 dwellings.

It is surprising that a very large allocation (SKPR-330) has been introduced to The Deepings at this stage in the plan-making process. The current Proposed Housing and Mixed-Use Site Allocations document does not include any justification for this significant change in approach. It would seem premature for SKDC to pursue growth at this significant scale whilst there are a number of other suitable, available and achievable alternatives nearby. There are a number of medium scale sites within the existing confines of Market Deeping, that could together deliver an appropriate amount of growth.

Character

SKPR - 330 is located on the east side of Linchfield Road, which at present marks the far eastern edge of Market Deeping. Whilst Linchfield Road is characterised by residential properties along the western side, the east side of the road offers expansive views out towards the open countryside beyond.

The site is on the southern side of Towngate East. This part of The Deepings is relatively undeveloped. There is an industrial park north of the proposed site but the remaining land on either side of Towngate East is undeveloped agricultural land which is open in character.

Therefore, the proposed inclusion of SKPR-330 for 840 dwellings would fundamentally change the character of this rural edge to the settlement.

It is therefore recommended that growth in The Deepings should focus on delivery of those sites already within the fabric of the settlement. For example SKPR-144 - Land to the West of Millfield Road - which was included as an allocation in the previous Regulation 18 Draft Local Plan in 2024 for 200 dwellings. The site is not subject to the same landscape constraints as SKPR-330 as it is enclosed by the bypass to the north and west, with mature existing landscaping trees along the majority of its perimeter.

Prematurity

Site SKPR-37 is included within the draft Local Plan for 680 dwellings. Despite this site being an existing allocation in the adopted Local Plan (DEP-142) and the made Neighbourhood Plan (DEP1-H2) for 680 dwellings, it has yet to come forward - to date, no planning application has been made on the site. Until this land is developed and built out, site SKPR-330 remains physically separated from the built form of Market Deeping. It remains the view of our client that any allocation beyond Linchfield Road is premature, with the site fundamentally unsuitable for growth at the present time.

Larger sites can take longer to be built out than small and medium ones. The proposal for 840 dwellings on a greenfield site is unlikely to deliver housing within the first five years following the Plan's adoption. This is reinforced by the position with SKPR-37 for which no application has been made for any of the 680 dwellings sought through planning policy.

Larger sites generally require additional consideration of infrastructure delivery and phasing, with higher up-front costs before the first units can be delivered. Whilst planning for larger scale development can bring benefits, it is not usually a fast way to deliver housing in the short term.

Smaller sites can be taken on by a single housebuilder/developer and brought to the market relatively quickly. For example, DEP-H1/SKPR-36, which was allocated for 73 dwellings in the same Local Plan/Neighbourhood Plan as SKPR-37, was granted outline permission in April 2025 for 80 homes.

It is considered that SKPR-144 - Land to the West of Millfield Road could come forward very quickly following allocation. As demonstrated by the planning application in 2020 on the site, there were no technical barriers or constraints to the provision of housing. Responses from the statutory consultees through the previous application process confirmed this position.

The previous submission (Appendix 1) demonstrates that the site is of a scale that is both manageable for delivery but also large enough to include generous areas of useable Public Open Space. It therefore presents an opportunity to deliver at least 200 dwellings (based on 30 dph) within the first five years of the adoption of the Plan.

Conclusions

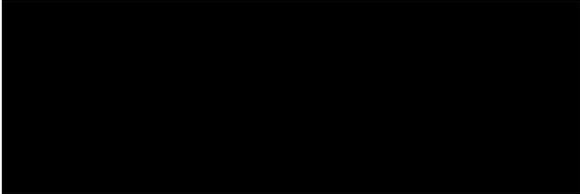
It is considered that the justification for the change in approach to growth in The Deepings is not justified and is not supported by robust evidence. Local circumstances demonstrate that it is smaller allocations that are more likely to come forward for development in this location. Therefore, the emerging Local Plan should seek to include sites that are of a size that is more attractive to the local market and able to deliver housing within the first five years.

LCC Corporate Property **object** to the removal of SKPR-144 'Land to the West of Millfield Road, Market Deeping' as an allocation for 200 houses.

The site remains a suitable, available and achievable location for growth in the district. LCC Corporate Property have a strong track record of bringing sites forward in South Kesteven, including sites allocated in the current adopted Local Plan in both Barrowby and Morton.

Please let me know if you need any further information in relation to this site or any other matters concerning our client in the district.

Yours faithfully,



Lynette Swinburne MRTPI
Associate Director (Planning)

Appendix 1: Call for Sites submission, November 2020